

In the Matter of

Amendment of Parts 73 And 74 of the)	
Commission's Rules to Establish Rules)	
For Digital Low Power Television,)	MB Docket No. 03-185
Television Translator, and Television)	
Booster Stations and to Amend Rules For)	
Digital Class A Television Stations)	

COMMENTS OF ADAMS TELCOM INC.

Adams Telecom, Inc. (Adams) by its consulting engineers, hereby submits these comments to the Federal Communications Commission (FCC) in the above captioned proceeding.

Adams has been awarded one RSA and One MSA in the Lower 700 Mhz auction. The licenses currently have interference issues. Adams realizes that it may be several years before they are able to fully utilize the licenses to meet the current needs for the rural farm communities.

Adams is submitting these comments in an effort to express concerns to the FCC on the NPRM and how this will impact their markets. Adams' concerns are detailed in the following comments:

1. LPTV Secondary Status:

The two markets received by the Adams have sufficient amount of interference to keep Adams from providing any service for several years. The FCC should hold the transition period in check for the TV stations and not allow secondary status for the LPTV and Television Translator Stations. Prolonging of the relocation causes a delay in Adams ability to

provide a quality service to the rural communities. The FCC should maintain its previous stand that the Television Translator Stations and LPTV stations are secondary and should be required to move with sufficient notification by the primary licensee.

2. Interference Problems

Adams markets are located between several metropolitan areas and interference coordination is seen as a large issue. In a case where the FCC chooses not to mandate the removal of stations which cause adjacent channel interference, the FCC will need to detail the steps to resolve any coordination and interference problems. The NPRM has no standards for protection for the primary licensee therefore confusion will occur causing unresolved problems which will be costly in both time and resources for all parties.

Conclusion:

Adams is concerned with the NPRM proposed by the FCC and requests the FCC to reverse its position. The FCC should enforce the transition period and require all interferers to relocate or meet a pre-described requirement to solve issues.

Respectfully Submitted,

By Lynn Merrill, PE
Consulting Engineer for
Pioneer Telephone Cooperative, Inc.
Monte R. Lee and Company
100 NW 63 St
Oklahoma City, OK 73116